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Comments: After reviewing the materials provided for the Square Butte Waterline Project in Billings County, North Dakota the USFWS would offer the following comments:

- 1. The Project Action Area should be entered into the USFWS-IPAC program for additional analysis of ESA species and recommendations for consultation.
- 2. Areas of native prairie should be surveyed for the presence of suitable Dakota skipper habitat. If present, then occupancy surveys would be warranted by a permitted DASK surveyor.
- 3. Impacts to trees should be noted and considered with the Endangered listing of Northern long-eared bats. Surveys for this species may be appropriate. HDD could be utilized to avoid and minimize impacts to wooded draws.
- 4. Dust should be controlled during all phases of construction.
- 5. Disturbed habitat should be reclaimed immediately. Forbes could be added to seed mix employed to enhance the area for pollinators.